

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 22-CR-20104-JEM(s)(s)(s)(s)**

**UNITED STATES OF AMERICA**

**vs.**

**MARIO ANTONIO PALACIOS PALACIOS,**

---

**STIPULATED FACTUAL PROFFER IN SUPPORT OF PLEA**

If this matter were to proceed to trial, the Government would prove the following facts beyond a reasonable doubt. The Parties agree that these facts, which do not include all facts known to the Government and the Defendant, **MARIO ANTONIO PALACIOS PALACIOS**, are sufficient to prove the guilt of the Defendant of the above-referenced Indictment:

In or about June 2021, the Defendant retired from his military service in Colombia and traveled to Haiti to work as a contractor for Counter Terrorism Unit Security / Federal Academy (“CTU”), an American company. The Defendant’s understanding was that he was hired to provide security for an individual who would be the next president of Haiti. In Haiti, the Defendant worked with a group of additional Colombian ex-military personnel who also had been hired by CTU. While in Haiti, the Defendant also met Antonio Intriago, who was a manager of CTU and who traveled to Haiti from the United States, specifically the Southern District of Florida. Intriago coordinated with other CTU personnel in the United States.

Within days of his arrival in Haiti, the Defendant was told on multiple occasions by leaders of the group that he and the other Colombian contractors would also be assisting authorities in capturing the current President of Haiti for the purpose of effectuating the President’s “arrest.” The

Defendant and the other Colombian contractors began training for operations that included entering and penetrating a building fortified with armed guards in order to seize an individual inside that building. CTU provided its Colombian contractors with security equipment, including armored vests, in June and July 2021. The Defendant's role in Haiti was that of a line security soldier who took orders from other Colombians, including German Alejandra Rivera Garcia. The defendant did not have the authority to make decisions nor did he take part in planning of any operation.

By at least July 6, 2021, the Defendant had been informed that the Colombian contractors would be conducting an operation at the Presidential residence. Before the beginning of the operation, the Defendant was also told that the president was going to die. On July 7, 2021, the Defendant and others entered the Presidential residence, and in fact the President was killed. The Colombian contractors took money and jewelry from the Presidential residence, and the Defendant kept some of that money and jewelry.

MARKENZIE LAPOINTE  
UNITED STATES ATTORNEY

Date: 12/22/2023

By: \_\_\_\_\_

ANDREA GOLDBARG, ESQ.  
ASSISTANT U.S. ATTORNEY

Date: 12/22/23

By: \_\_\_\_\_

ALFREDO IZAGUIRRE, ESQ.  
ATTORNEY FOR DEFENDANT

Date: 12/22/23

By: \_\_\_\_\_

Mario Palacios

MARIO ANTONIO PALACIOS PALACIOS  
DEFENDANT